

Cecily L. Kaffer
clk@kullmanlaw.com

The Kullman Firm
A Professional Law Corporation

www.kullmanlaw.com

Mobile Office:
63 South Royal Street
Suite 1100
Mobile, Alabama 36602

Post Office Box 1287
Mobile, Alabama 36633

Telephone: (251) 432-1811
Facsimile: (251) 433-1230

May 7, 2015

Mr. Daniel W. Jackson
daniel@jacksonlaw-tx.com

Re: Intermarine v. Spliethoff Bevrachtungskantoor, BV., et al.

Dear Mr. Jackson:

As you know, Intermarine sought an order compelling DropBox to produce documents after properly serving a subpoena on DropBox, and receiving no response. DropBox contends that it has grounds to contest the February 27, 2015, *Order to Produce Documents*, but is open to an informal resolution. DropBox wants Bihlet to email specific language to its legal department, and also wants to void the February 27, 2015, order.

Consequently, I propose that we resolve these issues on the following terms, which are agreeable to DropBox:

1. By no later than May 8, 2015, Bihlet will cause an email message to be sent from the email account, KBihlet@gmail.com, to Dropbox via its counsel at legal@dropbox.com. Bihlet's email will include as an attachment the executed consent form attached to this letter. Intermarine's counsel shall be provided with a contemporaneous copy of Bihlet's email and executed attachment.
2. Within ten (10) business days of receiving this account verification and express consent email from the account KBihlet@gmail.com, Dropbox shall disclose the Records to the account holder's attorney, Daniel W. Jackson, The Jackson Law Firm, via email to daniel@jacksonlaw-tx.com, or via physical delivery to 3900 Essex Lane, Suite 1116, Houston, TX, 77027, and shall simultaneously notify counsel for Intermarine that the records have been provided.
3. Following said disclosure, Intermarine will file the attached motion asking the Court to rescind the order entered on February 27, 2015.

Letter to Daniel W. Jackson
May 7, 2015
Page 2 of 2

4. Within five (5) business days of receiving the Records, Bihlet shall provide to Intermarine (1) subscriber information regarding the Dropbox Account; and (2) the file activity information, from January 1, 2012, to December 26, 2013, for all non-personal and non-privileged files within the Dropbox Account including files names and the dates files were added, edited, and or deleted. Within seven (7) business days of receiving the Records, Bihlet shall provide to Intermarine (3) all non-personal and non-privileged documents, from January 1, 2012, to December 26, 2013, together with metadata, from the complete contents of files, folders, and metadata of the Dropbox Account.

If this proposal is agreeable to you, please sign below, and return to me, and have your client send the email and executed consent form to DropBox.

Very truly yours,

Cecily L. Kaffer

CLK/ieh

Agreed:



Daniel W. Jackson
Attorney for defendant Kasper Bihlet

cc: Mr. William A. Durham
durham@easthamlaw.com